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10 Attorneys for Creditor

11 The Bloom Firm, a Professional Corporation

12 **UNITED STATES BANKRUPTCY COURT**

13 **NORTHERN DIVISION OF CALIFORNIA – OAKLAND DIVISION**

14 In re:

15 MICHA STAR LIBERTY,

16 Defendant(s).

Case No.: 24-40401 WJL III

[Chapter 13]

**THE BLOOM FIRM'S NOTICE OF  
VOLUNTARY WITHDRAWAL OF: (1)  
NOTICE OF MOTION AND MOTION  
FOR ORDER DISMISSING DEBTOR'S  
CHAPTER 13 BANKRUPTCY CASE  
WITH PREJUDICE; AND (2) NOTICE  
OF MOTION AND MOTION FOR  
SANCTIONS PURSUANT TO FED. R.  
BANKR. P. 9011**

Motions Currently set for Hearing:

Date: October 10, 2024

Time: 1:30 p.m.

Place: 220

U.S. Bankruptcy Court

1300 Clay Street, 2<sup>nd</sup> Flr.

Oakland, California

1 **TO THE HONORABLE WILLIAM J. LAFFERTY, UNITED STATES**  
2 **BANKRUPTCY JUDGE, THE OFFICE OF THE UNITED STATES TRUSTEE, THE**  
3 **CHAPTER 13 TRUSTEE, THE DEBTOR AND PARTIES IN INTEREST AND**  
4 **THEIR COUNSEL OF RECORD:**

5 **PLEASE TAKE NOTICE** that creditor Bloom Firm, A Professional Corporation  
6 (“Bloom”), hereby voluntarily withdraws its *Notice of Motion and Motion for Order*  
7 *Dismissing Chapter 13 Debtor’s Bankruptcy Case With Prejudice; Memorandum of Points*  
8 *and Authorities* [the “Motion to Dismiss”][Dkt. 67] and its *Notice of Motion and Motion for*  
9 *Sanctions Pursuant to Fed.R.Bankr. P. 9011; Memorandum of Points and Authorities* [the  
10 *Motion for Sanctions*] [Dkt. 69]. The hearings on the Motion to Dismiss and the Motion for  
Sanctions are currently set for October 10, 2024.

11 Bloom and debtor Micha Star Liberty (“Debtor”) have entered into a settlement  
12 agreement and stipulated to extend the deadline for Debtor to oppose the Motion to Dismiss  
13 and the Motion for Sanctions to September 26, 2024. As of the date of this Notice of  
14 Withdrawal, Debtor has not filed an opposition to either motion. Instead, Debtor filed a  
15 motion for dismissal of Debtor’s chapter 13 bankruptcy case on September 16, 2024. Bloom  
16 does not oppose dismissal of the Debtor’s bankruptcy case and is filing notice of non-  
17 opposition to the dismissal of the Debtor’s bankruptcy case.

18  
19 Dated: September 17, 2024

Respectfully submitted,

20 **CHORA YOUNG & MANASSERIAN LLP**

21  
22 By: /s/ Kevin Ronk

23 Paul P. Young, Esq., CFE

24 Kevin Ronk

25 Attorneys for creditor The Bloom Firm, A  
26 Professional Corporation  
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## CERTIFICATE OF SERVICE

I am at least 18 years of age and not a party to the action; my business address is:  
650 Sierra Madre Villa Ave., Suite 304, Pasadena, CA 91107.

On September 17, 2024, I served the interested parties with the document described as follows: **THE BLOOM FIRM'S NOTICE OF VOLUNTARY WITHDRAWAL OF: (1) NOTICE OF MOTION AND MOTION FOR ORDER DISMISSING DEBTOR'S CHAPTER 13 BANKRUPTCY CASE WITH PREJUDICE; AND (2) NOTICE OF MOTION AND MOTION FOR SANCTIONS PURSUANT TO FED. R. BANKR. P. 9011**

1. BY NEF: Service was accomplished through the Notice of Electronic Filing ("NEF") for parties and counsel who are registered ECF Users and identified below:

- **Jenelle C. Arnold on behalf of Creditor PNC Bank, N.A.:**  
ecfcanb@aldridgepite.com, jarnold@ecf.inforuptcy.com
- **Martha G. Bronitsky:** 13trustee@oak13.com
- **Sarah Lampi Little on behalf of Debtor Micha Star Liberty:**  
sarah@kornfieldlaw.com
- **Office of the U.S. Trustee/Oak:** USTPRegion17.OA.ECF@usdoj.gov
- **Jennifer C. Wong on behalf of Creditor CitiMortgage, Inc.:**  
bknotice@mccarthyholthus.com, jwong@ecf.courtdrive.com
- **Paul Young on behalf of Creditor The Bloom Firm, a Professional Corporation:** paul@cym.law, jaclyn@cym.law
- **Kevin Ronk on behalf of Creditor The Bloom Firm, a Professional Corporation:** Kevin@portilloronk.com, ronk.kc@gmail.com
- **Nikko S. Stevens on behalf of Creditor The Bloom Firm, a Professional Corporation:** nikko@cym.law
- **Cheryl Skigin on behalf of Creditor BMW Bank of North America:**  
caskigin@earthlink.net

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1 I declare under penalty of perjury under the laws of the United States of America  
2 that the foregoing is true and correct.

3 Executed on September 17, 2024 at Pasadena, California.

4 /s/ Jaclyn Poon

5 Jaclyn Poon  
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